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October 22, 2015

Hon. Joseph F. Bianco
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

RE: United States v. Philip Kenner
Docket Number: 13-607 (JFB)

Dear Judge Bianco:

At the last status conference on September 21, 2015, the Court granted the defendant's application to unseal the ex parte affidavit filed by the government in support of its post conviction protective order. Additionally, the Court directed that the government produce any additional bank/financial records and summary charts to be used during the course of the forfeiture phase of the trial, currently scheduled to begin on November 6, 2015.

On October 16, 2015, the government provided additional bank/financial records and summary charts in compliance with the Court's directive. To date, however, the ex parte affidavit has yet to be produced and, respectfully, the unsealing order of the Court has not been entered. Accordingly, the instant letter motion is filed seeking the issuance of an unsealing order based on the record of the court proceedings conducted on September 21, 2015.

Thank you for Your Honor's attention to this request.

Very truly yours,

Richard D. Haley

RICHARD D. HALEY

cc: All counsel or record via ECF